

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROBERT SYLVESTER KELLY,
also known as “R. Kelly”

Case No. 19 CR 567

Honorable Martha M. Pacold

**GOVERNMENT’S SUPPLEMENT TO ITS JURISDICTIONAL RESPONSE
TO DEFENDANT’S EMERGENCY MOTION FOR TEMPORARY
FURLOUGH (IN RESPONSE TO KELLY’S THIRD SUPPLEMENT**

Robert Kelly has created his own briefing schedule. As anticipated, Kelly has filed yet a third daily supplement to his motion: (1) unresponsive to the threshold issue this Court asked the parties to brief of whether this Court had jurisdiction to entertain Kelly’s motion; (2) absent of any citations to cases, statutes, or rules indicative of this Court having jurisdiction to entertain Kelly’s motion; (3) ignoring the briefing schedule and scope of the briefing imposed by this Court on June 11, 2025; and (4) assuming this Court and its staff will de-prioritize other matters properly brought before this Court so that Kelly can air his grievances from 800 miles away in a different jurisdiction. If there were a basis for this Court to have jurisdiction to entertain Kelly’s motion, surely Kelly would have pointed the Court in its direction by now in his third supplement to his motion. This is the behavior of an abuser and a master manipulator on display. Kelly is always the victim.¹

¹ *E.g.*, <https://www.youtube.com/watch?v=pafJHx-o21k> (at the 4:55 mark) (Last visited June 16, 2025).

Kelly claims with increasing urgency that officials are taking actions against him that cannot wait and must be brought before this Court on an urgent basis. *See generally* Dkt. 491. Has Kelly filed an action in the Eastern District of North Carolina to enjoin those officials from taking said actions (where that court would have jurisdiction over them)? Or, did Kelly instead choose to write to let this Court know that he is “cold” in prison, and to criticize the medical care that he is receiving. Dkt. 491 at 4-5. This Court does not have jurisdiction to afford Kelly the relief that he seeks. And Kelly knew this since at least July 2023 when this Court denied Kelly’s previous motion. *See* Dkt. 445. This Court should not allow Kelly to turn its docket into a grocery store checkout aisle tabloid.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

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CERTIFICATE OF SERVICE

I, Jason A. Julien, an attorney, certify that I served a copy of the foregoing Government's Supplement to Its Jurisdictional Response to Defendant's Emergency Motion for Temporary Furlough (In Response to Kelly's Third Supplement) by filing the same using the CM/ECF System, and that a copy will be provided to all parties of record designated to receive notice.

Respectfully submitted,

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